AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

SEP 18 2020

for the

David J. Bradley, Clerk

Southern District of Texas

United States of America v. Lorenzo Contreras Jr. (1983/USA)) Case No. M-70-1892-M
Defendant(s)	

CRIMINAL COMPLAINT						
I, the complainant in the	his case, state that the followir	ng is true to the best of my l	knowledge and belie	f.		
On or about the date(s) of	September 18, 2020	in the county of	Hidalgo	in the		
Southern District of	, the	defendant(s) violated:				
Code Section		Offense Descriptio	n			
21 USC § 952		Illegal Importation of a Controlled Substance / Approximately 12.84 Kilograms of Methamphetamine, a Schedule II Controlled Substance.				
21 USC § 963		Conspiracy to Illegally Import a Controlled Substance / Approximately 12.84 Kilograms of Methamphetamine, a Schedule II Controlled Substance.				
This criminal complain	nt is based on these facts:					
	See Atta	chment "A"				
♂ Continued on the a	ttached sheet.					
	•	/s/	Nicholas C. Stott			
Complaint authorized by: AUSA Roberto Lopez		Com	Complainant's signature			
Submitted by reliable electronic means, sworn to and attested to telephonically per Fed. R. Cr. 4.1, and probable cause found on:			Nicholas C. Stott, HSI Special Agent Printed name and title			
Date: 9/18/2020@4:39pm			Markel			
City and state:	McAllen, Texas	U.S. Magistr	Judge's signature U.S. Magistrate Judge J. Scott Hacker			

Attachment "A"

I, Nicholas C. Stott, am a Special Agent of the United States Homeland Security Investigations (HSI) and have knowledge of the following facts. The facts related in this attachment do not reflect the totality of information known to me or other agents/officers, merely the amount needed to establish probable cause. I do not rely upon facts not set forth herein in reaching my conclusion that a complaint should be issued, nor do I request that this Court rely upon any facts not set forth herein in reviewing this attachment in support of the complaint.

- 1. On September 18, 2020, Homeland Security Investigations in McAllen, Texas, (HSI McAllen) received a request for investigative assistance from the U.S. Customs and Border Protection (CBP) Office of Field Operations (OFO) at the Hidalgo Port of Entry (POE) in Hidalgo, Texas. CBP Officers (CBPOs) detained Lorenzo Contreras Jr. (hereinafter CONTRERAS), a citizen of the United States, the driver, sole occupant and registered owner of the vehicle, while attempting to enter the U.S. with approximately 12.84 kilograms (kg) of methamphetamine concealed within the rear quarter panels of the vehicle.
- 2. During primary inbound inspection, CBP Officers (CBPOs) obtained a negative oral declaration for fruits, food, alcohol, tobacco, drugs, weapons and currency over \$10,000.00. from CONTRERAS. CBPOs referred CONTRERAS and the vehicle to secondary inspection for an intensive examination.
- 3. During secondary inspection, the vehicle was X-rayed, revealing anomalies in the rear quarter panel area of the vehicle.
- 4. A physical search of the vehicle was conducted, and 23 cellophane and vacuum sealed packages, weighing approximately 12.84 kilograms, were discovered concealed within the rear quarter panel of the vehicle. CBPOs field tested the substance inside the packages which was presumptive positive for the properties and characteristics of methamphetamine.
- 5. Homeland Security Investigations (HSI), Special Agents (SA) responded to the Hidalgo POE to assist in the investigation. HSI SAs interviewed CONTRERAS who, after providing several inconsistent and admittedly false statements, stated he was hired by an unknown person in Mexico and to be paid \$500.00 USD to transport what he was told to be United States currency from the United States into Mexico. CONTRERAS stated he had also made several previous trips into the United States on behalf of the smuggling organization, allegedly for the purpose of smuggling currency into Mexico. A search of CONTRERAS' cellular telephone located communications with identified drug traffickers regarding CONTRERAS' travel itinerary.